

## II. Remarks

Reconsideration and allowance of the subject application are respectfully requested.

Claims 176-184 are pending in the application. Claim 176 is independent.

The undersigned and Applicants' representative, Mr. Bruce Dearling, would like to thank Examiners Luk and Utech for the cordial and productive interview of January 27, 2005. The Examiners' helpful comments and suggestions were instrumental in preparing this response.

As discussed at the interview, Claim 176 has been amended to eliminate what is believed to be a redundant recitation in the last two lines, and thus has not been amended for any reason related to patentability.

Claims 176-184 were rejected as being unpatentable over JP '948 and Bellehache, for the reasons discussed at pages 2-6 of the Office Action. Applicants respectfully traverse all art rejections.

As discussed during the interview, independent Claim 176 recites a novel, non-obvious combination of structure and/or function whereby, *inter alia*, the frame and the cooling pin are configured to cause the cooling pin (upon insertion into the molded article) to be **within the molded article but spaced away from the first region** (relatively high heat) and

not in contact therewith. As also urged at the interview, independent Claim 176 also recites that the tip of the cooling pin and the molded article **are both located within the respective holder** when it is in second position and when gaseous cooling fluid is being expelled. As discussed at the interview, none of the cited art (whether taken individually or in combination) discloses or suggests such a combination including the features discussed above.

First, JP '948 fails to disclose any structure configured to cause the cooling pin (upon insertion into the molded article) to be within the molded article but spaced away from the first region and not in contact therewith. In fact (and as the Examiners readily appreciated during the interview), JP '948 would be inoperable if the cooling pin were not in contact with the preform tip. Specifically, if the cooling pin were not in contact with the preform tip, the preform's open end would rest upon the frame, cutting off the air-flow passage 145, thus preventing the circulation of the air flow. Note also that JP '948 directly addresses the contingency discussed at page 5 of the Office Action whereby a larger preform might not contact the tip of the cooling pin. The English translation of page 312 states:

The air diffused between the cylindrical protrusion 146 and the preform P is released from a gap 145 formed between the lower end of the preform P and the preform carrier 14. **This means that even if the**

**length of the preform P is changed, the cylindrical protrusion may be covered with the preform P as it is.** ["Covered" means that the cooling pin carries the preform - see the English translation of page 311, and that the preform is "bottomed" on the cooling pin - see the English translation of page 313.]

(emphasis supplied)

Thus, JP '948 contemplates a different-sized preform, but still teaches that the preform is carried by the cooling pin, i.e., in contact with the cooling pin. It is noted, in passing, that the preform in JP '948 would also sustain damage if the preform were still warm and malleable, since the contacting of the pin against the internal surface would *inter alia* cause scratching and other deformation.

Second, JP '948 would also be inoperative if both the open end of the preform and the exterior surface of the cooling pin were "within the respective holder", as claimed. Specifically, the holders of JP '948 must be withdrawn from the cooling pins so that the apparatus' hood may be emplaced over the preforms to effectuate cooling. Thus, it is respectfully submitted that the present claims are fully patentable over JP '948 for this reason also. Indeed, FIG. 4 clearly shows a loading area ("IN"), whereas FIG. 2 also shows a preform cooler 10 having a top cover 18. Hence, the robot can only deliver the preforms to the vicinity of the pins 146 in the cooler, but cannot continue to hold the preforms during the subsequent cooling process. This structural difference is recited in the claims.

As also discussed at the interview, Applicants respectfully submit that no combination of cited art anticipates or renders obvious the claimed combination of features, as discussed above, and that legally insufficient motivation has been shown for making such a combination.

In view of the above amendments and remarks, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3500. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

  
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